

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust  
Litigation*, MDL 2817

*This document relates  
to:* ALL ACTIONS

No. 1:18-CV-864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

**STIPULATION RE: DEADLINES FOR MOTIONS TO  
COMPEL CHALLENGING PRIVILEGE LOG ENTRIES**

The Dealership Class Plaintiffs (“Dealership Plaintiffs”), Vendor Class Plaintiff Loop, LLC, d/b/a AutoLoop (“AutoLoop”), Plaintiff Cox Automotive, Inc. and its subsidiaries, Autotrader.com, Inc., Dealer Dot Com, Inc., Dealertrack, Inc., HomeNet, Inc., Kelley Blue Book Co., Inc., vAuto, Inc., VinSolutions, Inc., and Xtime, Inc. (collectively, “Cox Automotive”), Plaintiff Authenticom, Inc. (“Authenticom”), Plaintiff Motor Vehicle Software Corp. (“MVSC”), Defendant CDK Global, LLC (“CDK”), and Defendant The Reynolds and Reynolds Company (“Reynolds”) (collectively, the “Parties”), by and through their undersigned counsel, jointly submit this Stipulation and proposed Order regarding the deadlines for motions to compel relating to privilege logs.

WHEREAS, on May 7, 2018, Judge Amy J. St. Eve entered a Case Management Order applicable to all cases pending in this Multidistrict Litigation (“MDL”). *See* Dkt. 166;

WHEREAS, the Case Management Order established deadlines for the production of non-governmental privilege logs and motions to compel, if any, challenging those logs;

WHEREAS, pursuant to the Case Management Order, the Parties initially exchanged privilege logs on November 2, 2018;

WHEREAS, following the exchange of privilege logs the Parties met and conferred and agreed that revised versions of certain privilege logs would be exchanged on December 5, 2018, and exchanged such logs;

WHEREAS, to allow sufficient time for review of the revised privilege logs, on December 7, 2018, the Parties stipulated to a deadline for motions to compel, if any, challenging privilege logs of January 14, 2019;

WHEREAS, Dealership Plaintiffs issued challenges to specific entries in Defendants' privilege logs on December 26, 2018;

WHEREAS, CDK and Reynolds issued challenges to specific entries in Authenticom's privilege log on November 7, 2018 and January 7, 2019;

WHEREAS, CDK and Reynolds issued challenges to specific entries in MVSC's privilege log on December 3, 2018, December 17, 2018 and January 9, 2019;

WHEREAS, CDK issued challenges to specific entries in AutoLoop, Cox Automotive, and Dealership Plaintiffs' privilege logs on January 9, 2019;

WHEREAS, the Parties seek to allow sufficient time for the meet and confer process, exchange of privilege logs updated in response to specific entry challenges, and, if necessary, the briefing of motions relating to any potential issues relating to the revised logs; and

WHEREAS, the above-named Parties have reached the following stipulation with regard to the deadlines for privilege log challenges and related motions to compel, if any:

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties that the deadlines relating to privilege log challenges shall be as follows:

|  |                                |
|--|--------------------------------|
| Deadline for all parties to exchange any additional privilege log challenges they have to any party's privilege log.       | January 11, 2019               |
| Deadline for any party to serve a revised privilege log and produce any documents removed from that party's privilege log. | February 8, 2019               |
| Deadline to complete meet and confers regarding privilege log challenges.  | February 20, 2019              |
| Deadline for motions to compel, if any, challenging privilege entries after strict compliance with Local Rule 37.2         | March 1, 2019                  |
| Responses to any motion to compel regarding privilege logs   | 14 days from date of motion    |
| Replies in opposition to any motions to compel regarding privilege logs  | 7 days from filing of response |

STIPULATED AND AGREED:

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AutoLoop on behalf of itself and all  
others similarly situated; and Motor  
Vehicle Software Corp.*

/s/ Aundrea K. Gulley

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*Counsel for Defendant The Reynolds and  
Reynolds Company*

SO ORDERED:

DATED:

\_\_\_\_\_  
Hon. Robert M. Dow, Jr.  
UNITED STATES DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I, Peggy J. Wedgworth, an attorney, hereby certify that on January 14, 2019, I caused a true and correct copy of the foregoing STIPULATION RE: DEADLINES FOR MOTIONS TO COMPEL CHALLENGING PRIVILEGE LOG ENTRIES to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth